



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

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April 19, 2010

TO: Supervisor Gloria Molina, Chair
Supervisor Mark Ridley-Thomas
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Michael D. Antonovich

FROM: Wendy L. Watanabe
Auditor-Controller

SUBJECT: **HILLVIEW MENTAL HEALTH CENTER, INC. – A DEPARTMENT OF
MENTAL HEALTH SERVICE PROVIDER**

We completed a program review of Hillview Mental Health Center, Inc. (Hillview or Agency), a Department of Mental Health (DMH) service provider.

Background

DMH contracts with Hillview, a private non-profit community-based organization that provides services to clients in Service Planning Area 2. Services include interviewing program clients, assessing their mental health needs and developing and implementing a treatment plan. The Agency's headquarters is located in the Third District.

DMH paid Hillview on a cost-reimbursement basis between \$1.91 and \$4.50 per minute of staff time (\$115 to \$270 per hour) for services or approximately \$9.8 million for Fiscal Year 2008-09.

Purpose/Methodology

The purpose of our review was to determine the appropriateness of the services Hillview provided based on available documentation. This included a review of the Agency's billings to DMH, participant charts and personnel and payroll records. We also interviewed a number of the Agency's staff.

Results of Review

Hillview maintained documentation to support the service minutes sampled and the staff assigned to the County contract possessed the required qualifications. However, the Agency did not always comply with other County contract requirements. Specifically, Hillview:

- Did not complete some elements of the Client Care Plans and Progress Notes in accordance with the County contract.
- Did not document Informed Consent in three clients' charts sampled where the clients received psychotropic medication.

We have attached the details of our review along with recommendations for corrective action.

Review of Report

We discussed the results of our review with Hillview and DMH. In the attached response, the Agency concurs with our findings and recommendations. Due to the sensitive and personal information provided in their attachments, we only attached their response letter.

We thank Hillview management for their cooperation and assistance during this review. Please call me if you have any questions or your staff may contact Don Chadwick at (213) 253-0301.

WLW:MMO:JET:DC:EB

Attachment

c: William T Fujioka, Chief Executive Officer
Dr. Marvin J. Southard, Director, Department of Mental Health
Bonnie Bailer, President, Board of Directors, Hillview Mental Health Center, Inc.
Dr. Eva McCraven, Executive Director, Hillview Mental Health Center, Inc.
Public Information Office
Audit Committee

**DEPARTMENT OF MENTAL HEALTH
HILLVIEW MENTAL HEALTH CENTER, INC.
FISCAL YEAR 2008-09**

BILLED SERVICES

Objective

Determine whether Hillview Mental Health Center, Inc. (Hillview or Agency) provided the services billed in accordance with their County contract with the Department of Mental Health (DMH).

Verification

We selected 45 billings totaling 4,939 minutes from 362,319 service minutes of approved Medi-Cal billings for May and June 2009, which were the most current billings available at the time of our review (November 2009). We reviewed the Assessments, Client Care Plans and Progress Notes maintained in the clients' charts for the selected billings. The 4,939 minutes represent services provided to 25 program participants.

Results

Hillview maintained documentation to support the service minutes sampled. However, the Agency did not always complete some elements of the Client Care Plans, Progress Notes and Informed Consent in accordance with the County contract requirements.

Client Care Plans

Hillview did not complete the Client Care Plans in accordance with the County contract for seven (28%) of the 25 clients sampled. Specifically:

- Four Client Care Plans did not contain objectives and planned interventions for each type of treatment provided. We had a similar finding during our prior monitoring review.
- Four Client Care Plans contained objectives that did not relate to the Assessments, presenting problems or functional impairments.

The number of incomplete Client Care Plans above exceeds the total number of Client Care Plans in question because one Client Care Plan had both findings.

Progress Notes

Hillview did not complete five (20%) of the 25 Progress Notes sampled in accordance with the County contract. Specifically, the five Progress Notes billed for mental health services did not describe what the clients or service staff attempted and/or

accomplished towards the clients' goals. We had a similar finding during our prior monitoring review.

Informed Consent

Hillview did not document Informed Consent in three (33%) of the nine clients' charts sampled, in which the clients received psychotropic medication. Informed Consent is the client's agreement to a proposed course of treatment based on receiving clear, understandable information about the treatments' potential benefits and risks.

Recommendations

Hillview management ensure:

1. **Client Care Plans and Progress Notes are completed in accordance with the County contract.**
2. **Informed Consent is obtained and documented in the client's chart on an annual basis.**

STAFFING LEVELS

Objective

Determine whether the Agency maintained the appropriate staffing ratios for applicable services.

We did not perform test work in this section, as the Agency did not provide services that require staffing ratios for this particular program.

Recommendation

None.

STAFFING QUALIFICATIONS

Objective

Determine whether Hillview's treatment staff possessed the required qualifications to provide the services.

Verification

We reviewed the California Board of Behavioral Sciences' website and/or the personnel files for 19 of the 91 Hillview treatment staff who provided services to DMH clients during May and June 2009.

Results

Each employee in our sample possessed the qualifications required to provide the services billed.

Recommendation

None.

PRIOR YEAR FOLLOW-UP

Objective

Determine the status of the recommendations reported in the prior monitoring review completed by the Auditor-Controller.

Verification

We verified whether the outstanding recommendations from the prior monitoring review were implemented. The report was issued on August 16, 2006.

Results

Our prior monitoring report contained four recommendations. Hillview implemented one recommendation, did not implement two recommendations, and one recommendation was no longer applicable. The outstanding recommendations related to recommendation 1 contained in this report.

Recommendation

3. Hillview management implement the outstanding recommendations from the August 2006 monitoring report.

February 22, 2010

Wendy L. Watanabe, Auditor-Controller
Los Angeles County Department of Auditor-Controller
Kenneth Hall Administration
500 West Temple Street, Room 525
Los Angeles, CA 90012-3873



Re: Agency Response to Auditor-Controller Compliance Review

Dear Ms. Watanabe:

Hillview Mental Health Center, Inc. has reviewed the Auditor-Controller's Monitoring Report for contracted Medi-Cal billings provided during the period of May and June 2009. We were pleased to see that overall Hillview provided the services outlined in the contract, the agency employed qualified staff to provide the services billed and that our consumers felt the services met their expectations. This report is a formal response by Hillview Mental Health Center that explains the corrective actions that have been imposed to address the findings and recommendations of the Auditor-Controller Contract Compliance Review.

Attachments included in this report illustrate the systems processes that have been developed by Hillview Mental Health Center Management and the Quality Improvement Department to enhance our tracking of staff documentation and billing systems. The results of the audit indicated that Hillview maintained documentation to support 99% of the service minutes sampled; however, components of the Client Care Plans, Progress Notes, and Informed Consents were not in accordance with the County contract requirements. We have found the Auditor-Controller Compliance Review to be an educational and beneficial experience in developing quality services for our agency and the people we serve in the community. Hillview has taken the appropriate steps in ensuring compliance with our County contract with the Department of Mental Health.

HILLVIEW MENTAL HEALTH CENTER

Recommendations:

1. Ensure that the Client Care Plans and Progress Notes are completed in accordance with the County contract.
2. Ensure that Informed Consent is obtained and documented in the client's chart on an annual basis.

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Corrective Plan of Action:

Based upon the Auditor-Controller's review, the Quality Improvement (Q.I.) Department has taken the following measures to improve the quality of the documentation:

- Q.I. conducts a Peer Audit Review System on a weekly basis with the goal of reviewing 20% of a random sample of medical records per program. The form has been revised to include recommendations provided by the audit related to the Client Care Plan and the Progress Notes. (Attachment #1).
- The Q.I. Department performed an Inservice Training on January 6, 2010 (Attachment #2) regarding the findings of the Auditor-Controller Monitoring visit. On-going Inservice Trainings will be provided for all clinical and counseling staff with post-tests on the topic of Quality Documentation and Charting, to include documenting the contribution of each staff person involved in services and accomplishments towards the client's goal(s).
- Hillview plans to hire a Quality Assurance Clerk to monitor the completion of the Informed Consent forms on a daily basis. The Q.A. clerk will give monthly feedback to the CEO and the Q.I. Director as to the compliance of the psychiatrists in the completion of the form.
- Hillview's Medical Records Department has implemented a new process in which Informed Consents are clipped to the outside of the client's chart prior to each medication support visit, in an effort to assist the psychiatrist in completing the form.
- The Hillview Administration plans on informing all staff who had any audit findings regarding these concerns, and a copy of that report will be kept in the personnel file with the Human Resources Department.

There were no recommendations indicated for the Staffing Levels or the Staffing Qualifications.

Prior Year Follow-Up (2005-2006): Based upon the recommendations from 2005-2006, the following procedures were implemented and will continue on an on-going basis.

- Hillview's Quality Improvement Department implemented processes to assist in the development of the staff and monitor services were billed in accordance with our contract with the Los Angeles County Department of Mental Health.
- Cycle Notifications have been distributed to all clinical and counseling staff by the Quality Improvement Department monthly to inform the staff when Client Care Coordination Plans were due. In addition, the Q.I. Department has been monitoring the completion of all Client Care Plans and verifies client or responsible party signature on the plan.
- Cycle Review updates were given monthly to Program Directors and Hillview management to monitor the completion of the Client Care Plans.
- 2-day intensive individual documentation trainings were conducted for all clinical and counseling staff by the Q.I. Department identifying goals and interventions

that addresses Mental Health issues and the appropriate completion of County forms.

In conclusion, Hillview Mental Health Center appreciates the professionalism and assistance of the Auditor-Controller Monitoring Division during this audit process. Improvements to the documentation procedures will enhance the services we provide to the consumers and their families in our community.

Please feel free to contact me at (818) 896-1161, extension 211, if further clarification is needed. Thank you for your cooperation.

Sincerely,

Julie Jones, MFT for Dr. McCraven
OF DIRECTOR

Eva McCraven, Ph.D.
Executive Director
Hillview Mental Health Center